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August 14, 2009

Joseph F. Stoltz, Assistant Staff Director
Audit Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: Interim Audit Report - CWA COPE PCC

Dear Mr. Stoltz:

I am writing in response to your July 21st letter and the Interim Audit Report of the Audit Division.

CWA COPE PCC will comply with the recommendation entitled "Past Reporting" and amend all affected reports during the 2005-06 audit period to reflect receipts of the amounts from AFL-CIO COPE PCC on Line 29 rather than on Line 22.

CWA has no current plans to make further transfers of joint fundraising contributions to AFL-CIO COPE PCC and, therefore, will not be implementing the alternative procedures described in the recommendation entitled "Future Reports."

In complying with the only recommendation that would require action now by CWA COPE PCC, we do not concur with the legal analysis set forth in the Interim Audit Report concerning CWA COPE PCC's joint fundraising arrangement with AFL-CIO COPE PCC insofar as it concludes that 11 C.F.R. §§ 102.6(c)(4) and 102.8(b) apply to funds that are transferred to AFL-CIO PCC. We do agree with the Audit Division that "CWA COPE PCC can function as a collecting agent for AFL-CIO PCC" and that "CWA COPE PCC received sufficient receipts within 30 days prior to each of the four transfers to fund the transfer."

It remains the position of CWA COPE PCC that, as explained in our previous correspondence to the Audit Division, the procedures that CWA COPE PCC has utilized for many years in both undertaking its joint fundraising program with AFL-CIO COPE PCC and in reporting the associated transactions to the Commission, CWA COPE PCC has complied fully with the Federal Election Campaign Act and the Commission's regulations.

Thank you for your consideration.

Sincerely,

Jeffrey A. Rechenbach
Treasurer
CWA COPE PCC

cc: Annie Hill
Yvette Herrera
Mary O'Melveny
Alfonso Pollard
Laura Archer
Krystal Dehaba
Laurence E. Gold, CWA COPE PCC Counsel

